

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI

IN RE: Noble Health Real Estate LLC)
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Debtor(s)) Case No. 23-20051-11
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**MOTION TO VACATE ORDER OF DISMISSAL
AND TO REINSTATE CASE**

COMES NOW Debtor, Noble Health Real Estate, by and through their attorney, Ronald S. Weiss, and states:

1. On February 10, 2023, Noble Health Real Estate LLC filed a voluntary petition pursuant to Chapter 11 of the United States Bankruptcy Code.

2. The Court thereafter issued show cause orders directed at the deficiencies and incomplete filings. The Debtor began attempting to obtain the information necessary to address the deficiencies, much of which was within the knowledge and possession of former principal of the Debtor entity. One example was the confusion and unavailability of the correct tax ID number.

3. Certain of the information necessary to address the deficiencies identified by the Court was obtained and filed prior to February 28, 2023; however, certain information to complete other deficiencies had not been obtained and ultimately the case was dismissed. The Debtor now has the necessary information to correct the deficiencies, and should the case be reinstated. Those items, a copy of which are attached hereto and marked **Exhibit A**, would be appropriately filed.

4. The Debtor contends that based upon these facts the Order of Dismissal should be set aside and the case reinstated. No prejudice has occurred to any party and in fact the Debtor is engaged in negotiations with the secured creditor regarding the protection and maintenance of the real estate and resolution of the indebtedness.

If the deadline(s) for filing complaints pursuant to Fed. R. Bankr. P. 4004(a) or 4007(c), motions under Fed. R. Bankr. P. 1017(e), or proofs of claim under Fed R. Bankr. P. 3002(c) expired on or after the date the case was dismissed or if less than thirty days remains until such deadline, debtor(s) waive the right to object to complaints, motions, or proofs of claim filed under Fed R. Bankr. P. 4004(a), 4007(c), 1017(e), and 3002(c) on grounds of timeliness, so long as they are filed in the 30 days following notice of reinstatement of the case.

WHEREFORE, Debtor requests that the Court enter an Order vacating the dismissal and reinstating the Debtor's case, and for such other and further relief as the Court deems just and proper.

Date: March 08, 2023

/s/ Ronald S. Weiss
Debtor's Attorney
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Certificate of Service: I, Ronald S. Weiss, hereby certify a true and correct copy of the above and foregoing document was served on this 8th day of March 2023 to all affected creditors and parties in interest not receiving electronic notification.

/s/ Ronald S. Weiss
Ronald S. Weiss; MO #21215

Note: Do NOT use this form if case has been CLOSED. See Local Form for Motion to Vacate Dismissal and to Reopen Case.

ECF Event: Bankruptcy>Motion/Applications/Requests>Reinstate Case